

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	RM: 11579
Petition for Rulemaking of National Public	)	
Radio to Repeal Section 73.525 of the	)	
Commission's Rules	)	

To the Commission

**COMMENTS OF VENTURE TECHNOLOGIES GROUP, LLC**

Venture Technologies Group, LLC ("VTG") hereby submits the following comments in response to the above-referenced proceedings.

VTG has built dozens of LPTV, Class A and full power television stations, including several Channel 6 Class A and low-power television stations. VTG has actively worked with non-commercial FM stations to resolve any potential interference issues. In fact, in Chicago and Los Angeles where VTG operates low power television stations on Channel 6, it has successfully transmitted a valuable local service which can also be heard at 87.7 on the FM dial with no significant interference from any NCE FM. As such, VTG possesses valuable insights into this issue. VTG supports NPR's petition to repeal Section 73.525, thus freeing NCE FM stations from their obligation to protect Channel 6 television service. VTG believes that these regulations are no longer needed. As NPR rightly points out, modern digital television receivers are far less susceptible to adjacent FM-band interference than the analog television receivers that were in use when Section 73.525 was enacted in 1985.

Since June 12, 2009 all full-power television stations in the United States have converted to digital transmission facilities. As such, the only analog television broadcast on Channel 6 comes from LPTV and Class A services. While these stations provide a valuable public service to local and minority audiences, and are certainly deserving of the Commission's protection, it is worth noting that the primary receiving device for a substantial portion of these stations is an FM radio tuned to 87.7 MHz -- which is tuned each week by millions of listeners. Unlike older generation analog television receivers, most FM radios are perfectly capable of tuning in analog

Channel 6 audio on 87.7 MHz without interference, even in the presence of a strong FM broadcast on 88.1 MHz.

VTG sees no reason why Section 73.525 should stay on the books. It needlessly hamstring NCE FM service, while providing almost zero benefit to television stations broadcasting on Channel 6.

For too long NCE FM broadcasters have been at odds with Channel 6 television stations. VTG sees no reason why everybody can't get along. All that is required is flexibility on the part of the Commission. In addition to releasing NCE FM stations from Channel 6 protection obligations, VTG strongly urges the Commission to adopt a formal policy allowing LPTV and Class A television stations broadcasting on Channel 6 the option to convert to digital operations or continue broadcasting in analog if they choose to serve their audiences with a portion of their spectrum as an FM audio service at 87.7 MHz. We feel that this solution would serve the interests of NCE FM stations, Low Power FM Stations, Channel 6 television stations, and most importantly it would serve the public interest.

VTG does not need or want to hinder NCE FM broadcasters with needless Channel 6 protection obligations. The Commission should adopt a live and let live approach between NCE FM and Channel 6 stations. NCE FM broadcasters should not be required to protect Channel 6 television stations, and Channel 6 television stations should not be obligated to protect NCE FM stations. The Commission should repeal Section 73.525, and it should adopt a formal policy that would allow Channel 6 LPTV and Class A stations to choose how they want to deal with the elimination of the protection they currently enjoy, with a choice to convert to digital or to operate in analog and serve their communities with an FM audio service at 87.7 MHz instead.

Respectfully submitted,

VENTURE TECHNOLOGIES GROUP, LLC

By: 

Paul Koplin, Chief Executive Officer

December 2, 2009